

# DICKSTEINSHAPIRO<sub>LLP</sub>

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July 22, 2008

## Notice of Ex Parte Communications

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th St., S.W., Room TW-325  
Washington, DC 20554

**Re: WC Docket No. 08-92**

Dear Ms. Dortch:

On July 21, 2008, Albert H. Kramer and Robert F. Aldrich of this law firm behalf of APCC Services, Inc., met with Jodie May and Dennis Johnson of the Wireline Competition Bureau's Competition Policy Division to discuss APCC Services' position on the above-captioned application for transfer of assets from True LD, LLC to STi Prepaid, LLC.

In summarizing APCC Services' position, we highlighted three points. First, we emphasized that, unlike other proceedings where the Commission granted Section 214 transfer applications despite pending private complaints, in this proceeding there are Commission-initiated forfeiture proceedings pending against two carriers whose principal is also the principal of True LD, LLC.

Second, although the applicants make a number of arguments in defense of their application, they do not refute or even dispute APCC Services' factual showing of a close connection between True LD, Inc., its principal Jeffery Larsen, and the two companies – West Star Telecommunications, LLC and Global Access, Inc., named in the Commission's pending forfeiture proceedings.

Third, we urged the Commission to require, as minimum conditions for further consideration of True LD's asset transfer application, that Larsen, True LD, Global Access, and West Star (1) resolve the pending forfeiture proceedings, (2) correct the underlying violations in those proceedings by responding to all pending informal complaints against Global Access, West Star, and True LD, and (3) agree to submit to the Commission's jurisdiction in the pending forfeiture and complaint proceedings.

**DICKSTEINSHAPIRO<sub>LLP</sub>**

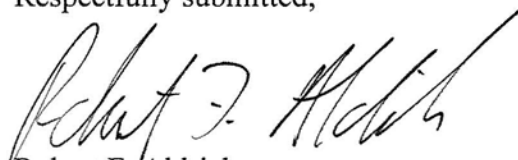
Marlene H. Dortch

July 22, 2008

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Finally, we showed the staff the enclosed additional document from the Arizona Corporation Commission confirming that Jeffery Larsen is managing member of True LD, LLC.

Respectfully submitted,



Robert F. Aldrich

*Attorney for APCC Services, Inc.*

Enclosure

cc: Jodie May  
Richard Johnson

**Jump To...**

[Scanned Documents](#)   [Amendments](#)   [Microfilm](#)

**Corporate Inquiry**

**File Number:** L-1135971-2

[Check Corporate Status](#)

**Corp. Name:** TRUE LD, LLC

**Domestic Address**

3045 N 1ST AVE STE A

TUCSON, AZ 85719

**Statutory Agent Information**

**Agent Name:** JOHN VOGEL

**Agent Mailing/Physical Address:**

3045 N 1ST AVE

TUCSON, AZ 85719

**Agent Status:** APPOINTED 09/08/2005

**Agent Last Updated:** 09/28/2004

**Additional Corporate Information**

**Corporation Type:** DOMESTIC L.L.C.

**Business Type:**

**Incorporation Date:** 06/03/2004

**Corporate Life Period:** PERPETUAL

**Domicile:** ARIZONA

**County:** PIMA

**Approval Date:** 06/03/2004

**Original Publish Date:** 09/20/2004

**Member Information**

JEFF LARSEN

MANAGER

3045 N 1ST AVE STE A

JOHN VOGEL

MANAGER

3045 N 1ST AVE STE A

TUCSON,AZ 85719

**Date of Taking Office:** 06/03/2004

**Last Updated:** 09/12/2005

TUCSON,AZ 85719

**Date of Taking Office:** 09/08/2005

**Last Updated:** 09/12/2005

JEFF LARSEN

MEMBER

3045 N 1ST AVE STE A

TUCSON,AZ 85719

**Date of Taking Office:** 06/03/2004

**Last Updated:** 09/12/2005

JOHN VOGEL

MEMBER

3045 N 1ST AVE STE A

TUCSON,AZ 85719

**Date of Taking Office:** 09/08/2005

**Last Updated:** 09/12/2005

**AFFIDAVIT OF PUBLICATION**  
for Arizona Corporation Commission

**ARIZONA DAILY STAR**  
4250 South Park Avenue  
Tucson, AZ 85714  
Phone (520) 573-4292  
Fax (520) 573-4311

**STATE OF ARIZONA**  
**COUNTY OF PIMA**

I, Janice Anderson, am authorized by the publisher as agent to make this affidavit of publication.  
Under oath, I state that the following is true and correct.

The Arizona Daily Star, is a newspaper which is published daily, is of general circulation and is in compliance with the Arizona Revised Statutes §§ 10-140.34 & 39-201: A & B. (Please note, publication has to be completed within 60 days of filing.) The notice will be/has been published three (3) consecutive times in the newspaper listed above.

**DATES OF PUBLICATION:**

September 6, 7, 8, 2004

RECEIVED  
847507  
SEP 20 2004

**THE NAME OF THE CORPORATION** True LD, LLC

ARIZONA CORP COMMISSION  
CORPORATIONS DIVISION

**CORPORATE FILE NUMBER** L-1135971-2

Note: This number is found on a top corner of the Commission approved document.

**TYPE OF DOCUMENT** Articles of Organization

Examples: Merger between party a and party b; name change from/to; foreign entity with a fictitious name; articles of information; application for authority; articles of organizations; amendment; Etc.

**AUTHORIZED SIGNATURE** Janice Anderson

Legal Advertising Representative

SUBSCRIBED AND SWORN TO BEFORE ME ON THE

19<sup>th</sup> DAY OF Sept 2004 (Year)

NOTARY SIGNATURE: Charles S. Hengstler

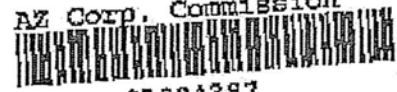


VALERIE S. GONZALES  
Notary Public - Arizona  
Pima County  
Expires 02/28/06

IT IS NOT NECESSARY TO ATTACH A CLIP OF THE PUBLISHED NOTICE.

**AFFIDAVIT OF PUBLICATION**  
for Arizona Corporation Commission

AZ Corp. Commission



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Tucson, AZ 85714  
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Janice Anderson  
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VALERIE S. GONZALES  
Notary Public - Arizona  
Pima County  
Expires 09/30/06

SUBSCRIBED AND SWORN TO BEFORE ME ON THE

19<sup>th</sup> DAY OF Sept (Month), 2004 (Year)

NOTARY SIGNATURE Valerie S. Gonzales

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